



**Cal/EPA**

**California  
Environmental  
Protection  
Agency**



**Air Resources Board**

P.O. Box 2815  
2020 L Street  
Sacramento, CA  
95812-2815



**Pete Wilson  
Governor**

**James M. Strock  
Secretary for  
Environmental  
Protection**

June 13, 1996

Mr. David Howekamp  
Director  
Air and Toxics Division  
U.S. Environmental Protection Agency  
Region IX  
75 Hawthorne Street  
San Francisco, California 94105-3901

Dear Mr. Howekamp:

This letter provides supplemental information requested by your staff to support the U.S. Environmental Protection Agency's (U.S. EPA's) final rulemaking to approve the 1994 California State Implementation Plan (SIP) for Ozone. In three attachments to this letter, we provide additional detail that supplements the technical corrections identified in the State's formal comment letter.

#### State and Local Measures

In Attachment A, we provide a detailed table of corrections needed to ensure that the notice is consistent with the local plans and the ARB element of the SIP. These corrections affect the specific measures listed, the adoption and implementation dates, and the emission reductions relied upon in the SIP. This table reflects the revised rule schedules for the South Coast and Ventura, being submitted to you under separate cover.

#### Program/Plan Descriptions

To improve the description of the California SIP and related requirements in the final notice, we offer text corrections in Attachment B. These corrections affect the description of California's air quality programs, the scope of the SIP and U.S. EPA's action, and the presentation of local plans.

Mr. David Howekamp

June 13, 1996

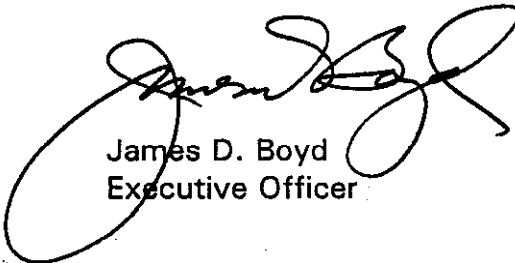
Page 2

Summary Emission Reduction Spreadsheets

In Attachment C, we provide summary spreadsheets identifying the reductions that the State committed to achieve and that we expect from the federal government, by measure, area, and milestone year. These summary tables contain the numbers used in the rate-of-progress and attainment demonstrations, as reflected in Volume IV of the California SIP.

If you have any questions or need additional information, please contact me at (916) 445-4383, or Ms. Lynn Terry, Assistant Executive Officer, at (916) 322-2739.

Sincerely,



James D. Boyd  
Executive Officer

Attachments

Mr. David Howekamp

June 13, 1996

Page 3

cc: (with all attachments)

Mr. Marty Keller, Bureau of Automotive Repair

Mr. James Wells, Department of Pesticide Regulation

Mr. Doug Allard, Santa Barbara County Air Pollution Control District

Mr. Richard Baldwin, Ventura County Air Pollution Control District

Mr. Ken Corbin, Feather River Air Quality Management District

Mr. Norman Covell, Sacramento Metro Air Quality  
Management District

Mr. David L. Crow, San Joaquin Valley Unified Air Pollution  
Control District

Mr. Ron Duncan, El Dorado County Air Pollution Control District

Mr. Chuck Fryxell, Mojave Desert Air Quality Management District

Mr. Larry Greene, Yolo-Solano Air Quality Management District

Mr. Dick Johnson, Placer County Air Pollution Control District

Dr. James M. Lents, South Coast Air Quality Management District

Mr. Thomas Paxson, P.E., Kern County Air Pollution Control District

Mr. Richard J. Sommerville, San Diego Air Pollution Control District

# ATTACHMENT A

## CORRECTIONS TO STATE AND LOCAL MEASURES

FedReg ver: Page, Column, Paragrp	WWW ver.: Part-Page	Item	Shown in Notice	Correction
10927	2-3	Reductions from M-1, LDV Scrappage	SC 2007 numbers shown ROG = 12, NOx = 10	delete 2007 reductions
10928	2-3	Reductions from M-2, LDV Advanced Technology	SC 2007 numbers shown and ROG higher than 2008 ROG = 7, NOx = 9	delete 2007 reductions
10928	2-4	Reductions from M-3, MDV ULEV standard	Sac 2002 ROG = 0 SD 1999 ROG = 0.9, NOx = 6.5	2002 ROG = 0.2 SD 1999 ROG = 0, NOx = 0
10928	2-4	Reductions from M-4, HDDV- Incentive for Early Intro Low-NOx Engines	Reductions shown for SC only	Creditable reductions in Ventura, Sac, SED, SJV, Kern also (see Att. C)
10928	2-5	Reductions from M-5, HDDV- Additional NOx Reductions	SD 1999 ROG = 0.7, NOx = 8.3	SD 1999 ROG = 0, NOx = 0
10929	2-6	Reductions from M-7, HDV Scrappage	SC 2002 ROG = 1 SC 2007 numbers shown ROG = 1, NOx = 8	2002 ROG = 0 (0.21) delete 2007 reductions
10929	2-7	Reductions from M-8, HDGV Lower Emission Standards	SD 1999 ROG = 0.1, NOx = 0.5	SD 1999 ROG = 0, NOx = 0
10930	2-7	Reductions from M-9, Off-Road Diesel Eqp't - CA std.	SC 2005 ROG = 0 SC 2007 numbers shown ROG = 4, NOx = 35	SC 2005 ROG = 0.5 delete 2007 reductions
10930	2-8	Reductions from M-11, Gas/LPG Industrial Eqp't - CA std.	Reductions shown for SC only	Creditable reductions in Ventura, Sac, SED also (see Att. C)
10933	2-15	Reductions from Enh. I/M	SC 2002 NOx = 35.5 SED 2005 ROG = 2.9 SED 2007 NOx = 2.8 Sac 2005 ROG = 5.1 SJV 1999 NOx = 4.9	SC 2002 NOx = 35.6 SED 2005 ROG = 2.6 SED 2007 NOx = 2.7 Sac 2005 ROG = 5.2 SJV 1999 NOx = 5.0

### Abbreviations:

ROG/VOC: Reactive Organic Gas/Volatile Organic Compound, NOx: Oxides of Nitrogen

Sac: Sacramento Region, SC: South Coast, SD: San Diego, SED: Southeast Desert, SJV: San Joaquin Valley, Ven: Ventura

FedReg ver: Page, Column, Paragraph	WWW ver.: Part-Page	Item	Shown in Notice	Correction
10935	2-18	Reductions from California Consumer Products and Aerosol Paint Program (beyond those achieved by CP-1)	SED 2002 ROG=0.4 SED 2007 ROG=4.0 SD 1999 ROG = 16.6	SED 2002 ROG = 0.6 SED 2007 ROG = 3.9 SD 1999 ROG = 0
10935	2-19	Reductions from 1990 Pesticide Emissions Baselines:	<i>shows percent reduction for each area, except SD, in 1996, 1999, 2002, and 2005</i>	<i>delete table; commitment is for a 20% reduction from 1990 levels by 2005 in each SIP area, except SD. We only took credit in the attainment year:</i> SJV 1999 = 12% Sac 2005 = 20% Ven 2005 = 20% SED 2007 = 20% SC 2010 = 20%
10935-10936	2-19/20	Reductions from Pesticide Measure ("reductions counted toward the ROP milestones and attainment in each area")	<i>see above correction</i>  SC 1999 ROG = 1.5 SC 2002 ROG = 1.6 SC 2005 ROG = 1.3 SC 2008 ROG = 1.6 SED 2005 ROG = 1.2  Sac 2005 ROG = 2.7 SD 1999 ROG = 0.2	<i>no credit prior to attainment</i> SC 1999 VOC = 0 SC 2002 VOC = 0 SC 2005 VOC = 0 SC 2008 VOC = 0 SED 2005 VOC = 0  Sac 2005 ROG = 2.8 SD 1999 ROG = 0
10945	3-21	San Joaquin Valley Attainment Demonstration Table-North Region: - "Committed Local Measures" - "Total"	SJV 1999 NOx=0 SJV 1999 NOx=11	SJV 1999 NOx=5 SJV 1999 NOx=15
10946-10947	3-23 to 3-26	Sac Region Local Measures: Emission Reductions for 1996	<i>Table label for first column of emission reductions shows 1996 in Fed Reg version (1999 in WWW version)</i>	<i>Sac should have reductions from new commitments for 1999, 2002, and 2005 only</i>
10946-10947	3-23 to 3-26	Sac Region Local Measures: Architectural Coatings	Adopt = PCAPCD 4/95	Adopt = PCAPCD 3/95
10946-10947	3-23 to 3-26	Sac Region Local Measures: Fugitive Hydrocarbon Emissions	Adopt = YSAPCD Adopted 5/94	Adopt = YSAPCD Adopted 4/94

**Abbreviations:**

ROG/VOC: Reactive Organic Gas/Volatile Organic Compound, NOx: Oxides of Nitrogen

Sac: Sacramento Region, SC: South Coast, SD: San Diego, SED: Southeast Desert, SJV: San Joaquin Valley, Ven: Ventura

Remainder of attachments pertain to non-pesticide sections of the SIP.